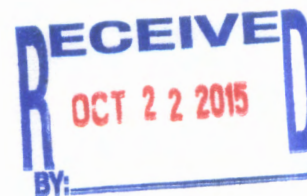




BARRACK | RODOS | BACINE

A Professional Corporation
ATTORNEYS AT LAW



Samuel M. Ward
sward@barrack.com

October 16, 2015

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, DC 20460
(202) 566-1667

Re: Freedom of Information Act Request

Dear Sir/Madam:

We hereby request that the Environmental Protection Agency ("EPA") produce the categories of documents and records recited below, regardless of the format or medium in which the requested documents are maintained. If the EPA takes the position that any documents sought pursuant to this request are exempt from disclosure, we request that the EPA provide an index, including a description of the document, the basis upon which the EPA contends that it is exempt from disclosure and the consequences of disclosing said documents.

1. All documents or data in the possession of the EPA supporting the September 18, 2015 Notice of Violation (the "Notice of Violation") addressed to Volkswagen AG and executed by Philip A. Brooks.
2. All documents and communications received from Volkswagen in response to the Notice of Violation.
3. Communications between the EPA and Volkswagen relating to or discussing the results of testing performed on Volkswagen automobiles by the International Council for Clean Transportation (ICCT) and West Virginia University (WVU).
4. All documents provided by Volkswagen in support of the certification applications including, but not limited to, plans and schematics, submitted by Volkswagen to CARB for the following automobiles equipped with 2.0 liter diesel engines:
 - o Volkswagen Jetta, Jetta Sportswagon (Model Years 2009-2015);
 - o Volkswagen Beetle, Beetle Convertible (Model Years 2009-2015);
 - o Audi A3 (Model Years 2009-2015);
 - o Volkswagen Golf (Model Years 2009-2015);



- Volkswagen Passat (Model Years 2014-2015); and
 - Volkswagen Golf Sportswagen (Model Years 2015).
5. All documents provided by Volkswagen in support of the certification applications submitted by Volkswagen to CARB for the following automobiles equipped with diesel engines:
- Volkswagen Jetta (Model Years 2005-1006);
 - Volkswagen Passat (Model Years 2005-2006); and
 - Volkswagen Golf (Model Years 2005-2006).

Barrack Rodos & Bacine is willing to pay a maximum of \$250.00 in costs relating to the EPA's response to the above request. If the estimated cost of the EPA's response to the above request exceeds \$250.00, please contact me with an estimate of the total cost.

If you have any questions regarding the above request, please do not hesitate to call me at (619) 230-0800.

Sincerely,

A handwritten signature in blue ink, appearing to be 'S. Ward', with a large loop at the end. The signature is written over the printed name 'SAMUEL M. WARD'.

SAMUEL M. WARD

SMW/cf



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